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TO: **Economic Support Supervisors  
Economic Support Lead Workers  
Training Staff  
Child Care Coordinators  
W-2 Agencies  
Workforce Development Boards  
Job Center Leads and Managers**

FROM: Amy Mendel-Clemens  
Communications Section  
Bureau of Health Care Eligibility

**BHCE/BWP OPERATIONS MEMO**

No: 04-34

DATE: 07/06/2004

FS	<input type="checkbox"/>	MA	<input type="checkbox"/>	SC	<input type="checkbox"/>
CTS	<input type="checkbox"/>	CC	<input type="checkbox"/>	W-2	<input checked="" type="checkbox"/>
FSET	<input type="checkbox"/>	EA	<input type="checkbox"/>	CF	<input type="checkbox"/>
JAL	<input type="checkbox"/>	JC	<input type="checkbox"/>	RAP	<input type="checkbox"/>
WIA	<input type="checkbox"/>	WtW	<input type="checkbox"/>		
Other	EP	<input type="checkbox"/>			

PRIORITY: HIGH

SUBJECT: **WISCONSIN WORKS (W-2) CASE CLOSURES**

**EFFECTIVE DATE:** Immediately

**PURPOSE**

The purpose of this Operations Memo is to respond to requests by the W-2 agencies to compile a list of existing W-2 program requirements that, if not cooperated with, may result in a W-2 case closure. In addition, this memo pairs both the policy guidelines with the appropriate CARES case closure procedures.

**BACKGROUND**

W-2 cases may close when participants fail to meet or cooperate with W-2 financial or nonfinancial eligibility criteria and other program requirements. Some nonfinancial and financial reasons for case closure are very basic and widely recorded. For example, if an individual:

- no longer resides in Wisconsin,
- begins receiving SSI,
- fails to cooperate with Child Support; or
- exceeds income and/or asset limits for two consecutive months.

However, there are additional W-2 eligibility policies related to specific types of noncooperation with W-2 program requirements, which may result in case closure. An agency may find a

participant ineligible in any given month for not cooperating with any of these policies. The difference between “noncooperation” and “nonparticipation” is that “noncooperation” refers to not cooperating with program eligibility requirements. “Nonparticipation” refers to not participating in program activities assigned on the Employability Plan (EP). Currently, both payment reductions and the issuance of strikes address nonparticipation. See the W-2 Manual, Chapter 11 for more information on these nonparticipation policies.

As is true with nonparticipation, in the event of noncooperation with specific program requirements, the FEP must explore potential barriers that may be interfering with a participant’s ability to cooperate. This must be done *prior* to finding a participant ineligible for noncooperation. At a minimum, the agency has a responsibility to:

- a) Initiate action to uncover why the participant has not completed the required activity in the event that unidentified barriers exist.** FEPs must document thoroughly in case comments and on the appropriate CARES screens actions taken to uncover barriers that may be contributing to the noncooperation.

*Examples:*

- Questioning the participant as to why she has not been cooperating and then fully exploring the responses. Meaning, if the participant says, “I have been busy,” the FEP should follow up with “doing what or how so?” The FEP should continue to question until there is reasonable certainty that the participant has offered all possible reasons for not cooperating.
- Providing the participant with information on how to cooperate with program requirements and the penalty for ongoing noncooperation.
- Conducting home visits.
- Reviewing the history of the case, including the Barrier Screening Tool (BST) results and any formal assessments, to determine if any issues were identified early on in the participant’s connection with W-2 that may still be a factor affecting cooperation.
- Offering the BST again.
- Reviewing the Employability Plan to ensure that activities assigned were appropriate. Appropriate activities should include, but not be limited to, education, training, work, treatment, counseling, etc. These activities must be individually designed and based on the participant’s strengths, needs, abilities, family circumstances and identified barriers and disabilities. Activities must be designed to assist the participant overcome barriers to employment and provide the skills needed to secure and maintain full-time employment.
- Talking with worksite supervisors and other individuals the participant may be working with such as the SSP, child welfare worker or other social workers.

**b) Take steps to address the barriers that may have caused the noncooperation.**

*Examples:*

- Referring participant to supportive services that may be appropriate for assisting with overcoming barrier(s) to finding and maintaining employment.
- Referring participants for formal assessments in order to identify necessary accommodations and specific appropriate activities.
- Identifying and assigning appropriate activities.

**c) Apply payment reductions/strikes as appropriate prior to determining ineligibility.**

Although a case may be closed for any of the noncooperation reasons identified in this memo, it may be appropriate to first apply a payment reduction or strike prior to closing the case.

W-2 agencies must develop internal procedures regarding these steps that need to be taken prior to closing a case. These procedures must be in writing and available at the W-2 agency upon request. Internal monitoring by the W-2 agency will help ensure that FEPs are applying the case closure policies consistently.

When it is determined that a W-2 case is going to close for not cooperating with program requirements, W-2 agencies must follow existing policies and procedures in order to avoid fact-finders, improper notification to participants, backdating placements and issuing auxiliary or supplemental checks.

In addition, when a W-2 agency is going to close a case, it must offer assistance in developing a Supportive Services Plan (SSP) with each participant. See Operations Memo 02-12 for more information on developing an SSP.

**CASE CLOSURE POLICIES**

**FAILURE TO COMPLETE JOB SEARCH** ([W-2 Manual 2.2.0](#)): A W-2 participant may be required to search for unsubsidized employment throughout his or her participation in a W-2 employment position. If a W-2 participant who is assigned job search activities on the employability plan (EP) fails to complete these activities, the participant may be found ineligible for the W-2 program. This requirement pertains to both individuals in paid placements and case management placements and only after the BST has been offered to the participant using the BST Agreement form. Job search assistance activities are designed to assist and prepare a W-2 applicant/participant in conducting a successful job search. These activities focus on enhancing an individual's employability by introducing techniques and improving methods used to obtain employment. More common job search activities include: career exploration, resume creation, job application completion, and individual and group job search activities. Less common job search activities include: anger management/interpersonal skills, problem solving/decision making skills, time management, and appropriate personal grooming/dress. These practical life skills increase a person's self-esteem and facilitate the pursuit of better job opportunities.

Appropriate W-2 activity codes for the broad spectrum of job search activities include: **ES** (Employment Search), **MO** (Job Readiness/Motivation), **PL** (Parenting/Life Skills) and **CE** (Employment Counseling). Refer to the [W-2 MANUAL 5.1.2.1](#) for a complete list of job search assistance activities.

**NOTE ➤** This policy does not apply to Americorps\*VISTA Volunteers (see the [W-2 Manual, Chapter 5.3.0](#) for more information on Americorps\*VISTA Volunteers.)

#### CARES Case Closure Procedures:

1. Tran To ACWI and enter the W-2 End Date.
2. Run SFEX with appropriate dates. Refer to the attached document “Shortcut to Running SFEX with Dates” for instructions.
3. Screen SFCS will indicate that the W-2 AG will close with reason codes 262 – “AG Member is not in a valid placement” and 268 – “An adult is not caring for an eligible child.” These codes will be overridden on AGOE.
4. Tran to AGOE.
  - A. In the ‘Reasons Override’ field, delete reason codes 262 and 268 and enter code 219 (“An adult in the family failed to complete job search activities.”) This closure reason will appear on the closure notice issued to the participant.
  - B. View the payment amount determined by CARES in the ‘W-2 Payment Override’ field. If appropriate, enter a W-2 Payment Override.
  - C. Enter code ‘POL’ in the ‘Override Reason Code’ field. Your supervisor has to approve the override.
  - D. Confirm the Override on AGOE. (Do not re-run SFEX, the overrides will fall out!)
5. Re-run SFEX without dates.
6. Repeat the override steps on AGOE.
7. On AGECE, confirm the closure of W-2.
8. Tran to ACEC and create an alert to change ACPA for W-2. Enter a date at least one calendar month in the future from the W-2 End Date.

**NOTE ➤** Failing to wait at least one calendar month before updating ACPA will result in incorrect notification to the W-2 participant.
9. Once W-2 has been closed at least one calendar month, tran to ACPA to change the W-2 Request to ‘N,’ run SFEX and confirm W-2.

**Example:** Marnie is a CSJ participant. She has employment training in both child care and retail. She has been assigned to a CSJ worksite at a local thrift shop for 20 hours per week and to job search activities for 10 hours per week. Her job search activities include applying for specific jobs identified by the FEP as well as attending a weekly workshop geared toward work preparedness. Marnie sporadically attends her worksite assignment and has not followed through on her job search activities. In order to determine why Marnie has not been participating, the FEP schedules a number of appointments for which Marnie fails to appear. The FEP sends a final notice informing Marnie that if she does not appear for her next scheduled appointment, her case will close due to her failure to cooperate with job search requirements. After reviewing the participant’s case history, including BST results and other informal assessment results, the FEP closes the case as there does not appear to be any barriers to employment and Marnie has not cooperated with assigned job search activities.

***FAILURE TO ACCESS OTHER PUBLIC ASSISTANCE PROGRAMS OR RESOURCES*** ([W-2 Manual 2.2.4](#)): A W-2 applicant or participant may be required, as determined by the FEP, to apply for and accept other public assistance programs or resources that may be available, prior to

being determined eligible for W-2 services or during W-2 participation. Other sources of public assistance or resources may include, but are not limited to:

- Unemployment Insurance;
- Worker's Compensation;
- Child Support;
- Veterans benefits; and
- Workforce Investment Act (WIA) programs.

Cooperation in applying for these other public assistance programs or resources must be included as assigned activities on the individual's employability plan. Applicants or participants who refuse to apply for and accept other public assistance programs or resources that may be available are not eligible or may lose eligibility for a W-2 employment position or a Job Access Loan.

#### CARES Case Closure Procedures:

1. Tran to screen AFNC and enter noncooperation reason 'AOB' – Person has failed/refused to apply for other benefits.
2. Tran To ACWI and enter the W-2 End Date.
3. Run SFEX with appropriate dates. Refer to the attached document "Shortcut to Running SFEX with Dates" for instructions.
4. The W-2 AG will close with reason codes 260 – "Your W-2 services have ended" and 207 – "An adult in your family did not apply for other programs." These closure reasons will appear on the closure notice issued to the participant.
5. Check the benefit amount on EWGT. (Overrides of the benefit amount are performed on AGOE.)
6. On AGECE, confirm the closure of W-2.
7. Tran to ACEC and create an alert to change ACPA for W-2. Enter a date at least one calendar month in the future from the W-2 End Date.  
NOTE➤ Failing to wait at least one calendar month before updating ACPA will result in incorrect notification to the W-2 participant.
8. Once W-2 has been closed at least one calendar month, tran to ACPA to change the W-2 Request to 'N,' run SFEX and confirm W-2.

VERIFICATION OF INFORMATION ([W-2 Manual 4.1.0](#)) The agency must verify all nonfinancial and financial information to determine whether or not an applicant/participant qualifies for employment services, case management, or a Job Access Loan. The applicant or participant has seven working days from the date the verification request is made to provide the needed verification. The participant must be informed in writing of the verification items required, including the due date. If the individual does not have the power to produce verification, or requires assistance to do so, the W-2 agency must assist the participant in seeking the verification. If the individual has made a reasonable effort and cannot obtain required information and the W-2 agency assistance did not produce the required information, the application cannot be denied or the case closed based on the information that could not be obtained. The FEP must use the best available information to process the case.

If the individual does not make a reasonable effort to obtain the required information or refuses or fails to do so, the application may be denied or the W-2 case may be closed.

NOTE ➤ Declining a formal assessment must not be considered failing to verify information. Therefore, a case cannot close for declining a formal assessment. See

Operations Memo 04-23 **W-2 PAYMENT REDUCTION POLICY CHANGES, Working with Participants that Decline Formal Assessment** section.

CARES Case Closure Procedures:

1. Tran back to the verification fields where questions marks '?' were entered and enter 'NV.' (Hint – EEVC can provide clues where the question marks were entered.)
2. Tran to ACWI and enter the W-2 End Date. Enter the date the verification was due, but not received.
3. Run SFEX with appropriate dates. Refer to the attached document "Shortcut to Running SFEX with Dates" for instructions.
4. On screen SFCS, the W-2 AG will close with reason code 112 – "Information needed to determine eligibility for this program has not been verified. See your verification checklist or contact your worker for more information." This closure reason will appear on the closure notice issued to the participant.
5. Check the benefit amount on EWGT. (Overrides of the benefit amount are performed on AGOE.)
6. On AGECE, confirm the closure of W-2.
7. Tran to ACEC and create an alert to change ACPA for W-2. Enter a date at least one calendar month in the future from the W-2 End Date.  
NOTE➤ Failing to wait at least one calendar month before updating ACPA will result in incorrect notification to the W-2 participant.
8. Once W-2 has been closed at least one calendar month, tran to ACPA to change the W-2 Request to 'N,' run SFEX and confirm W-2.

**EMPLOYABILITY PLAN (EP) EXPIRATION** ([W-2 Manual 6.1.1](#)): If an EP review date expires without a new EP in place because the participant either fails to keep EP development appointments or fails to return a mailed EP, without good cause, W-2 eligibility may end. The FEP must send an appointment notice scheduling the EP development meeting for at least ten calendar days prior to the EP expiration date. In that notice, the FEP must inform the participant that it is specifically an EP development meeting and, if the participant does not appear for the appointment on the scheduled day without good cause, the case will close effective the date of the EP expiration.

CARES Case Closure Procedures:

1. Tran To ACWI and enter the W-2 End Date.
2. Run SFEX with appropriate dates. Refer to the attached document "Shortcut to Running SFEX with Dates" for instructions.
3. Screen SFCS will indicate that the W-2 AG will close with reason codes 262 – "AG Member is not in a valid placement" and 268 – "An adult is not caring for an eligible child." These codes will be overridden on AGOE.
4. Tran to AGOE.
  - A. In the 'Reasons Override' field, delete reasons 262 and 268 and enter code 558 ("You are no longer eligible for W-2 because your Employability Plan (EP) has expired and you failed to keep an EP development appointment or failed to return a mailed EP without good cause. Contact your W-2 worker with questions.") This closure reason will appear on the closure notice issued to the participant.
  - B. View the payment amount determined by CARES in the 'W-2 Payment Override' field. If appropriate, enter a W-2 Payment Override.
  - C. Enter code 'POL' in the 'Override Reason Code' field. Your supervisor has to approve the override.

- D. Confirm the Override on AGOE. (Do not re-run SFEX, the overrides will fall out!)
5. Re-run SFEX without dates.
6. Repeat the override steps on AGOE.
7. On AGECE, confirm the closure of W-2.
8. Tran to ACEC and create an alert to change ACPA for W-2. Enter a date at least one calendar month in the future from the W-2 End Date.  
NOTE➤ Failing to wait at least one calendar month before updating ACPA will result in incorrect notification to the W-2 participant.
9. Once W-2 has been closed at least one calendar month, tran to ACPA to change the W-2 Request to 'N,' run SFEX and confirm W-2.

REPORT CHANGES WITHIN 10 DAYS ([W-2 Manual 2.2.0](#)): Participants are required to report changes in circumstances that may affect eligibility within 10 calendar days after the change occurs, except for temporary absence of a child which must be reported within five working days. If the FEP becomes aware of a change in the participant's circumstances, he or she must first confirm the change with the participant or have some sort of verification supporting the change.

CARES Case Closure Procedures:

1. When notified from the source that there may be a change in the participant's circumstances, enter a question mark '?' in the verification of the appropriate field.
2. Run SFEX to generate the verification checklist (EEVC).
3. Complete screen AGVC to generate the verification checklist notice that will be sent to the participant.
4. If the participant fails to provide verification of the information, follow steps 1 – 8 above for VERIFICATION OF INFORMATION.

DECLINING W-2: When W-2 participants request to leave the W-2 program, they must sign the *Voluntarily Declining Aid (DWSW-2233)* form. A signed copy of this form must be placed in the record prior to changing the request for W-2 on ACPA to "N".

CARES Case Closure Procedures:

1. Tran to ACWI and enter the W-2 End Date.
2. Tran to ACPA and change the request for W-2 to 'N'.
3. Run SFEX with appropriate dates. Refer to the attached document "Shortcut to Running SFEX with Dates" for instructions.
4. On SFCS, the W-2 AG will close with reason code 054 – "You did not ask for this type of assistance." This is the closure reason that will appear on the closure notice issued to the participant. **Please note:** Reason Code 054 overrides any other closure reasons set by CARES. For this reason, do not change the W-2 ACPA screen to 'N' without this form being signed by the participant. The only time you may change the W-2 ACPA screen to 'N' without the signed form in hand is when the W-2 AG has been closed for more than a calendar month.
5. Check the benefit amount on EWGT. Overrides of the benefit amount are performed on AGOE.
6. On AGECE, confirm the closure of W-2.

**LOSS OF CONTACT WITH THE AGENCY:** There are instances when the participant has lost contact with the agency. Loss of contact means that the FEP and participant have not had any contact for at least 30 consecutive calendar days. During this time, the agency must make repeated and varied attempts to contact the participant at the participant's home, assigned worksite or the location of any other assigned activities. "Repeated" attempts means the FEP or another W-2 agency representative must make weekly attempts, at least. "Varied" attempts means a combination of attempts to locate, such as worksite visits, home visits, phone calls, letters, etc. There also must be a pattern of no contact, e.g., no one available on home visits, no returned phone calls, missed meetings, missed activities, etc. All contact attempts must be documented in CARES. If, after 30 consecutive calendar days, the FEP and participant have not had any contact, the FEP must send out a notice to verify the participant's contact information such as address and phone number. If the participant fails to respond within seven days, W-2 eligibility may end for failing to verify information. See **VERIFICATION OF INFORMATION** above for more information.

#### CARES Case Closure Procedures:

1. Tran to ACCH and enter a '?' in the 'Address Verification' field.
2. Run SFEX to generate the verification checklist (EEVC).
3. Complete screen AGVC to generate the verification checklist notice that will be sent to the participant.
4. If the participant fails to respond within 7 days, tran to ACCH and enter an 'NV' in the 'Address Verification' field.
5. Tran to ACWI and enter the W-2 End Date.
6. Run SFEX with appropriate dates. Refer to the attached document "Shortcut to Dating SFEX" for instructions.
7. On screen SFCS, the W-2 AG will close with reason code 112 – "Information needed to determine eligibility for this program has not been verified. See your verification checklist or contact your worker for more information."
8. Tran to AGOE.
  - A. In the 'Reasons Override' field, you will see reason code 112 listed. Enter code 136 ("You have lost contact with the agency."). These closure reasons will appear on the closure notice issued to the participant.
  - B. View the payment amount determined by CARES in the 'W-2 Payment Override' field. If appropriate, enter a W-2 Payment Override.
  - C. Enter code 'POL' in the 'Override Reason Code' field. Your supervisor has to approve the override.
  - D. Confirm the Override on AGOE. (Do not re-run SFEX, the overrides will fall out!)
9. Re-run SFEX without dates.
10. Repeat the override steps on AGOE.
11. On AGECE, confirm the closure of W-2.
12. Tran to ACEC and create an alert to change ACPA for W-2. Enter a date at least one calendar month in the future from the W-2 End Date.
 

NOTE➤ Failing to wait at least one calendar month before updating ACPA will result in incorrect notification to the W-2 participant.
13. Once W-2 has been closed at least one calendar month, tran to ACPA to change the W-2 Request to 'N,' run SFEX and confirm W-2.

#### **ATTACHMENT**

##### Short-Cut to Running SFEX With Dates



**CONTACTS**

Contact local DWS Regional Office Staff

BHCE CARES Information & Problem Resolution Center

★Program Categories – FS – Food Stamps, MA – Medicaid, SC – Senior Care, CTS – Caretaker Supplement, CC – Child Care, W-2 – Wisconsin Works, FSET – Food Stamp Employment and Training, CF – Children First, EA – Emergency Assistance, JAL – Job Access Loan, JC - Job Center Programs, RAP – Refugee Assistance Program, WtW – Welfare to Work, WIA – Workforce Investment Act, Other EP – Other Employment Programs.

DWD/DWS/BW-2/MM